

# **Exhibit 1**

**From:** [Laura King](#)  
**To:** [Hahn, Ashley V.](#); [Greenfield, Elliot](#); [Ceresney, Andrew J.](#); [Schaper, Michael](#); [Schlegelmilch, Stephan J](#); [Born, Natascha](#); "[michael@mjllaw.com](#)"; "[sahuja@dmablaw.com](#)"; "[cbeal@dmablaw.com](#)"  
**Cc:** [Andrew Dunlap](#); [Oscar Shine](#); "[Todd M. Schneider](#)"; "[Matthew S. Weiler](#)"; "[Mahzad K. Hite](#)"; "[Srujana Shivji](#)"; "[Tether Team](#)"  
**Subject:** RE: In re Tether and Bitfinex Crypto Asset Litigation, 1:19-cv-09236 (S.D.N.Y.): 30(b)(6) Deposition Bitfinex Defendants  
**Date:** Tuesday, August 8, 2023 5:01:18 PM

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Counsel,

We are available at 11:30am on Friday. If that works for you, please send an invite.

Thanks,  
Laura

**Laura King**

Associate [[Email](#)]

Selendy Gay Elsberg PLLC [[Web](#)]

Pronouns: she, her, hers

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**From:** Hahn, Ashley V. <[avhahn@debevoise.com](mailto:avhahn@debevoise.com)>  
**Sent:** Tuesday, August 8, 2023 3:28 PM  
**To:** Greenfield, Elliot <[egreenfield@debevoise.com](mailto:egreenfield@debevoise.com)>; Laura King <[lking@selendygay.com](mailto:lking@selendygay.com)>; Ceresney, Andrew J. <[aceresney@debevoise.com](mailto:aceresney@debevoise.com)>; Schaper, Michael <[mschaper@debevoise.com](mailto:mschaper@debevoise.com)>; Schlegelmilch, Stephan J <[sjschlegelmilch@debevoise.com](mailto:sjschlegelmilch@debevoise.com)>; Born, Natascha <[nborn@debevoise.com](mailto:nborn@debevoise.com)>; 'michael@mjllaw.com' <[michael@mjllaw.com](mailto:michael@mjllaw.com)>; 'sahuja@dmablaw.com' <[sahuja@dmablaw.com](mailto:sahuja@dmablaw.com)>; 'cbeal@dmablaw.com' <[cbeal@dmablaw.com](mailto:cbeal@dmablaw.com)>  
**Cc:** Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Oscar Shine <[oshine@selendygay.com](mailto:oshine@selendygay.com)>; 'Todd M. Schneider' <[tschneider@schneiderwallace.com](mailto:tschneider@schneiderwallace.com)>; 'Matthew S. Weiler' <[mweiler@schneiderwallace.com](mailto:mweiler@schneiderwallace.com)>; 'Mahzad K. Hite' <[mhite@schneiderwallace.com](mailto:mhite@schneiderwallace.com)>; 'Srujana Shivji' <[sshivji@schneiderwallace.com](mailto:sshivji@schneiderwallace.com)>; 'Tether Team' <[tetherteam@schneiderwallace.com](mailto:tetherteam@schneiderwallace.com)>  
**Subject:** RE: In re Tether and Bitfinex Crypto Asset Litigation, 1:19-cv-09236 (S.D.N.Y.): 30(b)(6) Deposition Bitfinex Defendants

Counsel,

Please let us know what time works best for you to meet and confer on Friday August 11, 2023 regarding the Bitfinex Defendants' 30(b)(6) deposition.

Thank you,  
Ash Hahn

**Ashley V. Hahn** | Associate | Debevoise & Plimpton LLP | [avhahn@debevoise.com](mailto:avhahn@debevoise.com) | +1 212 909 6320 | [www.debevoise.com](http://www.debevoise.com)

Preferred Pronouns: she/her/hers

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**From:** Greenfield, Elliot <[egreenfield@debevoise.com](mailto:egreenfield@debevoise.com)>

**Sent:** Friday, August 4, 2023 1:03 PM

**To:** 'Laura King' <[king@selendygay.com](mailto:king@selendygay.com)>; Ceresney, Andrew J. <[aceresney@debevoise.com](mailto:aceresney@debevoise.com)>; Schaper, Michael <[mschaper@debevoise.com](mailto:mschaper@debevoise.com)>; Schlegelmilch, Stephan J <[sjschlegelmilch@debevoise.com](mailto:sjschlegelmilch@debevoise.com)>; Born, Natascha <[nborn@debevoise.com](mailto:nborn@debevoise.com)>; 'michael@mjllaw.com' <[michael@mjllaw.com](mailto:michael@mjllaw.com)>; 'sahuja@dmablaw.com' <[sahuja@dmablaw.com](mailto:sahuja@dmablaw.com)>; 'cbeal@dmablaw.com' <[cbeal@dmablaw.com](mailto:cbeal@dmablaw.com)>

**Cc:** 'Andrew Dunlap' <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; 'Oscar Shine' <[oshine@selendygay.com](mailto:oshine@selendygay.com)>; 'Todd M. Schneider' <[tschneider@schneiderwallace.com](mailto:tschneider@schneiderwallace.com)>; 'Matthew S. Weiler' <[mweiler@schneiderwallace.com](mailto:mweiler@schneiderwallace.com)>; 'Mahzad K. Hite' <[mhite@schneiderwallace.com](mailto:mhite@schneiderwallace.com)>; 'Srujana Shivji' <[sshivji@schneiderwallace.com](mailto:sshivji@schneiderwallace.com)>; 'Tether Team' <[tetherteam@schneiderwallace.com](mailto:tetherteam@schneiderwallace.com)>; Hahn, Ashley V. <[avhahn@debevoise.com](mailto:avhahn@debevoise.com)>

**Subject:** RE: In re Tether and Bitfinex Crypto Asset Litigation, 1:19-cv-09236 (S.D.N.Y.): 30(b)(6)  
Deposition Bitfinex Defendants

Adding Ash to the chain. Thanks.

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**Elliot Greenfield** | Debevoise & Plimpton LLP | [egreenfield@debevoise.com](mailto:egreenfield@debevoise.com) | +1 212 909 6772 | 66 Hudson Boulevard,  
New York, NY 10001 | [www.debevoise.com](http://www.debevoise.com)

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**From:** Greenfield, Elliot

**Sent:** Friday, August 04, 2023 12:58

**To:** 'Laura King'; Ceresney, Andrew J.; Schaper, Michael; Schlegelmilch, Stephan J; Born, Natascha; [michael@mjllaw.com](mailto:michael@mjllaw.com); [sahuja@dmablaw.com](mailto:sahuja@dmablaw.com); [cbeal@dmablaw.com](mailto:cbeal@dmablaw.com)

**Cc:** Andrew Dunlap; Oscar Shine; Todd M. Schneider; Matthew S. Weiler; Mahzad K. Hite; Srujana Shivji; Tether Team

**Subject:** RE: In re Tether and Bitfinex Crypto Asset Litigation, 1:19-cv-09236 (S.D.N.Y.): 30(b)(6)  
Deposition Bitfinex Defendants

Laura,

That date does not work on our end. As noted in our letter on Monday, we were available this week

to meet and confer. Next week is more difficult, but we are generally available on Friday August 11. Please let us know what time works best for you.

Thanks,  
Elliot

**Elliot Greenfield** | Debevoise & Plimpton LLP | [egreenfield@debevoise.com](mailto:egreenfield@debevoise.com) | [+1 212 909 6772](tel:+12129096772) | 66 Hudson Boulevard,  
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**From:** Laura King [<mailto:lking@selendygay.com>]  
**Sent:** Thursday, August 03, 2023 17:07  
**To:** Greenfield, Elliot; Ceresney, Andrew J.; Schaper, Michael; Schlegelmilch, Stephan J; Born, Natascha; [michael@mjlaw.com](mailto:michael@mjlaw.com); [sahuja@dmablaw.com](mailto:sahuja@dmablaw.com); [cbeal@dmablaw.com](mailto:cbeal@dmablaw.com)  
**Cc:** Andrew Dunlap; Oscar Shine; Todd M. Schneider; Matthew S. Weiler; Mahzad K. Hite; Srujana Shivji; Tether Team  
**Subject:** RE: In re Tether and Bitfinex Crypto Asset Litigation, 1:19-cv-09236 (S.D.N.Y.): 30(b)(6) Deposition Bitfinex Defendants

**\*EXTERNAL\***

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Counsel,

Please let us know if you are available to meet and confer regarding the Bitfinex 30(b)(6) deposition on Monday, August 7 between 2-5pm.

Thanks,  
Laura

**Laura King**

Associate [[Email](#)]

Selendy Gay Elsberg PLLC [[Web](#)]

Pronouns: she, her, hers

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**From:** Greenfield, Elliot <[egreenfield@debevoise.com](mailto:egreenfield@debevoise.com)>  
**Sent:** Monday, July 31, 2023 11:22 PM  
**To:** Laura King <[lking@selendygay.com](mailto:lking@selendygay.com)>; Ceresney, Andrew J. <[aceresney@debevoise.com](mailto:aceresney@debevoise.com)>; Schaper, Michael <[mschaper@debevoise.com](mailto:mschaper@debevoise.com)>; Schlegelmilch, Stephan J <[sjschlegelmilch@debevoise.com](mailto:sjschlegelmilch@debevoise.com)>; Born, Natascha <[nborn@debevoise.com](mailto:nborn@debevoise.com)>; [michael@mjlaw.com](mailto:michael@mjlaw.com); [sahuja@dmablaw.com](mailto:sahuja@dmablaw.com); [cbeal@dmablaw.com](mailto:cbeal@dmablaw.com)

**Cc:** Matthew Lindenbaum <[matthew.lindenbaum@nelsonmullins.com](mailto:matthew.lindenbaum@nelsonmullins.com)>; Rob Lindholm <[robert.lindholm@nelsonmullins.com](mailto:robert.lindholm@nelsonmullins.com)>; [ccording@willkie.com](mailto:ccording@willkie.com); [arudzin@omm.com](mailto:arudzin@omm.com); [wpao@omm.com](mailto:wpao@omm.com); Campbell, Eamonn W. <[ecampbell@omm.com](mailto:ecampbell@omm.com)>; [ghollon@mcnaul.com](mailto:ghollon@mcnaul.com); Timothy B. Fitzgerald <[tfitzgerald@mcnaul.com](mailto:tfitzgerald@mcnaul.com)>; Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Oscar Shine <[oshine@selendygay.com](mailto:oshine@selendygay.com)>; Todd M. Schneider <[tschneider@schneiderwallace.com](mailto:tschneider@schneiderwallace.com)>; Matthew S. Weiler <[mweiler@schneiderwallace.com](mailto:mweiler@schneiderwallace.com)>; Mahzad K. Hite <[mhite@schneiderwallace.com](mailto:mhite@schneiderwallace.com)>; Srujana Shivji <[sshivji@schneiderwallace.com](mailto:sshivji@schneiderwallace.com)>; Tether Team <[tetherteam@schneiderwallace.com](mailto:tetherteam@schneiderwallace.com)>

**Subject:** RE: In re Tether and Bitfinex Crypto Asset Litigation, 1:19-cv-09236 (S.D.N.Y.): Notice of 30(b)(6) Deposition Bitfinex Defendants

Please see the attached letter. Thanks.

**Elliot Greenfield** | Debevoise & Plimpton LLP | [egreenfield@debevoise.com](mailto:egreenfield@debevoise.com) | +1 212 909 6772 | 66 Hudson Boulevard, New York, NY 10001 | [www.debevoise.com](http://www.debevoise.com)

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**From:** Laura King [<mailto:lking@selendygay.com>]

**Sent:** Tuesday, July 18, 2023 17:09

**To:** Greenfield, Elliot; Ceresney, Andrew J.; Schaper, Michael; Schlegelmilch, Stephan J; Born, Natascha; [michael@mjllaw.com](mailto:michael@mjllaw.com); [sahuja@dmablaw.com](mailto:sahuja@dmablaw.com); [cbeal@dmablaw.com](mailto:cbeal@dmablaw.com)

**Cc:** Matthew Lindenbaum; Rob Lindholm; [ccording@willkie.com](mailto:ccording@willkie.com); [arudzin@omm.com](mailto:arudzin@omm.com); [wpao@omm.com](mailto:wpao@omm.com); Campbell, Eamonn W.; [ghollon@mcnaul.com](mailto:ghollon@mcnaul.com); Timothy B. Fitzgerald; Philippe Selendy; Andrew Dunlap; Oscar Shine; Todd M. Schneider; Matthew S. Weiler; Mahzad K. Hite; Srujana Shivji; Tether Team

**Subject:** In re Tether and Bitfinex Crypto Asset Litigation, 1:19-cv-09236 (S.D.N.Y.): Notice of 30(b)(6) Deposition Bitfinex Defendants

**\*EXTERNAL\***

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Counsel,

Please see attached for Plaintiffs' Notice of Rule 30(b)(6) Deposition of Defendants iFinex Inc, BFXNA Inc, and BFXWW Inc. We withdraw our prior notice to iFinex Inc. dated May 15, 2023.

Best,  
Laura

**Laura King**

Associate [[Email](#)]

Selendy Gay Elsberg PLLC [[Web](#)]

Pronouns: she, her, hers

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